

ORIGINAL

1 MTN
2 Thomas Pham
3 Oanh Pham
4 7624 Golden Lantern Court
5 Las Vegas, Nevada 89139
6 (702) 360-9229
7 In Proper Person

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SEP 18 3 04 PM '09

U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

8 UNITED STATES BANKRUPTCY COURT
9 SOUTHERN DISTRICT OF NEVADA

10 In Re:

11 Pham, Thomas
12 Pham, Oanh,

13 Debtors.

Case No.: 09-25519

MOTION TO CONVERT CHAPTER 7

FILING INTO CHAPTER 13 PLAN

October 20, 2009
2:30PM

14 COMES NOW, Debtors, Thomas Pham and Oanh Pham, and hereby request to the Court
15 to grant its motion to convert the Chapter 7 filing into a proper Chapter 13 Plan, as Debtor is a
16 real estate agent and monthly income varies on any given month.

17 Joint Debtor is a 1099 employee, and her income varies each and every month.

18 Debtor's initial filing of a Chapter 7 Petition was initiated to stop the foreclosure process
19 of the residence located at 7624 Golden Lantern Court, Las Vegas, Nevada 89139.
20

21 Debtors would like to be given the opportunity of filing a Chapter 13 Plan to repay
22 creditors, and have an attempt to save their home, by renegotiating the mortgage with the lender.
23

CONCLUSION

24 WHEREFORE it is respectfully requested that Debtors MOTION TO CONVERT
25 CHAPTER 7 FILING INTO CHAPTER 13 PLAN be entered in favor of Debtors, as well as any
26

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28 ////

1 other relief this court deems just and proper in the premises.

2 Dated September 15, 2009.

3 Respectfully Submitted

4 

5
6 Original Signature

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8 Oanh Pham
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